

**FILED**  
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US DISTRICT COURT E.D.N.Y.

★ JUL 14 2015 ★

BROOKLYN OFFICE

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

SAURI J. MOREL,

Plaintiff,

v.

SPECIAL AGENT DANIEL REED, Immigration  
and Customs Enforcement ("ICE") Narcotics  
Smuggling Unit, SPECIAL AGENT JOHN  
LATTUCA, ICE Narcotics Smuggling Unit,  
SPECIAL AGENT MICHAEL FERNANDEZ, ICE  
Narcotics Smuggling Unit,

Defendants.

Civil Action No. CV-11-1808  
(Irizarry, J.)  
(Bloom, M.J.)

SAURI J. MOREL,

Plaintiff,

v.

UNITED STATES OF AMERICA;

Defendant.

Civil Action No. CV-12-5145 ✓  
(Irizarry, J.)  
(Bloom, M.J.)

[Consolidated Case]

**STIPULATION AND ORDER OF DISMISSAL WITH PREJUDICE**

IT IS HEREBY STIPULATED AND AGREED, by and between the parties of the above-entitled actions, by their respective undersigned attorneys, that Plaintiff's Consolidated Amended Complaint and all claims therein, including, but not limited to, all claims asserted against defendants Reed, Lattuca, Fernandez, and the United States of America, be and hereby are dismissed with prejudice pursuant to Rule 41(a)(1)(ii) of the Federal Rules of Civil Procedure.

*Stipulation of Dismissal With Prejudice*

Morel v. Reed, et al. 11-CV-1808 (DLI)(LB)/Morel v. United States, 12-CV-5145 (DLI)(LB)

Each party hereto agrees that this dismissal is without costs or fees. The parties further agree that no further suit will be instituted for the same causes of action which have been asserted herein, or for any other causes of action arising out of the incidents or circumstances which gave rise to this lawsuit.

Dated: July 7, 2015  
New York, New York

CLEARY GOTTlieb STEEN &  
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By: Adam E. Luft / MEM w/ permission

Dated: July \_\_, 2015  
Brooklyn, New York

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Fernandez, and United States of America  
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By: [Signature]  
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SO ORDERED this

14<sup>th</sup> day of July, 2015

s/Dora L. Irizarry

HONORABLE DORA L. IRIZARRY  
United States District Judge